

Hearing Date and Time: October 27, 2005 at 10:00 a.m.

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X	
In re:	:	
	:	Chapter 11
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	(Jointly Administered)
Debtors.	:	
	X	

**AMENDED JOINDER OF FUJIKURA AMERICA, INC. IN LIMITED
OBJECTIONS TO FINANCING MOTION AND INTERIM DIP
FINANCING ORDER, AND REQUEST BY FUJIKURA AMERICA, INC.
FOR ADEQUATE PROTECTION FOR PRE-PETITION SETOFF
RIGHTS AND PRESERVATION OF RECLAMATION RIGHTS**

Fujikura America, Inc. ("Fujikura") hereby submits this Amended Joinder in Limited Objections to Financing Motion and Interim DIP Financing Order, and Request for Adequate Protection for Pre-Petition Setoff Rights And Preservation of Reclamation Rights (the "Amended Objection") and states as follows:

1. On October 21, 2005 Fujikura objected to the (i) Motion of Delphi Corporation and its affiliated debtors (collectively, the "Debtors"), for a final order authorizing, among other things, post-petition financing (the "Motion"), and (ii) the Interim Order dated October 12, 2005 (the "Interim Order") granting in part the Motion, and joined in the limited objections filed by Robert Bosch Corporation and affiliates (Doc. 428); Mercedes-Benz U.S. International, Inc. (Doc. 435); Venture Plastics, Inc.

(Doc. 436); Calsonic Kansei North America, Inc. (Doc. 442); DaimlerChrysler Motors Company (Doc. 450); Decatur Plastic Products, Inc. (Doc. 451); Gibbs Die Casting Corporation (Doc. 455); Lorentson Manufacturing Company, Inc. (Doc. 458); Autocam Corporation (Doc. 459); and Lorentson Manufacturing Company Southwest, Inc. (Doc. 461) (the “Objection”).

2. This Amended Objection is being filed to supplement and amend the Objection by including a request for protection of Fujikura’s reclamation rights. On October 12, 2005, a demand for the reclamation of goods in the sum of \$61,514.83 was submitted by Fujikura with respect to goods received by one or more of the Debtors within the ten-day period prior to the date of filing of Debtor’s Chapter 11 Petitions (the “Reclamation Claim”). The Reclamation Claim was asserted pursuant to Section 546(c) of the Bankruptcy Code, Section 2-702 of the Uniform Commercial Code and applicable state law.

3. To the extent the relief sought in the Motion is granted, Fujikura requests that any final order entered by the Court, in addition to protecting its pre-petition setoff rights and granting it adequate protection, also preserve its Reclamation Claim and rights thereunder.

WHEREFORE, for the reasons set forth herein, Fujikura respectfully requests that any order entered by this Court with respect to the Motion address and grant the relief requested in the Objection and this Amended Objection, and that the Court grant such other and further relief as the Court deems just and proper.

Dated: October 25, 2005
Atlanta, GA

Respectfully submitted,

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Dated: October 25, 2005
New York, NY

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CERTIFICATE OF SERVICE

I, Robert W. Dremluk, an attorney, hereby certify that on this 25th day of October, 2005, a copy of the foregoing Amended Joinder of Fujikura America, Inc. in Limited Objections to Financing Motion and Interim DIP Financing Order, and Request by Fujikura America, Inc. for Adequate Protection for Pre-Petition Setoff Rights And Preservation of Reclamation Rights was mailed, first-class, postage prepaid to:

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